

United States District Court

SOUTHERN

DISTRICT OF
MCALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Eduardo Alberto Jasso-Juares *PRINCIPAL*

Mexico

Case Number:

YOB: 2000

M-19-3169 -M

Eduardo Martinez-Torres

Mexico

1998

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 27, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Juan Ocampo-Rodriguez, citizen of Mexico, and Enrique Jesus Dominguez-Carrillo, citizen of Mexico, along with five (5) other undocumented aliens, for a total of seven (7), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Mission, Texas to the point of arrest near Mission, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On December 27, 2019, a Border Patrol Agent was flagged down by a concerned citizen regarding a red in color pickup truck loading up with suspected illegal aliens near the entrance of Bentsen State Park in Mission, Texas.

The concern citizen stated that the truck was last seen going northbound on Bentsen Palm Drive at a high rate of speed. A Border Patrol Agent near the area immediately observed a truck matching the description, accelerating west towards Frontage Road from Inspiration Road. The agent proceeded to follow the truck and requested a license plate registration of the vehicle.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on December 28, 2019.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Jose Diaz

Signature of Complainant

Jose Diaz

Border Patrol Agent

Printed Name of Complainant

December 28, 2019 23:01
Date

at McAllen, Texas
City and State

Juan F. Alanis, U. S. Magistrate Judge
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-3169 -M

RE: Eduardo Alberto Jasso-Juares

CONTINUATION:

The Agent relayed the pickup trucks direction of travel to additional mobile agents and air support via service radio. The truck continued to drive erratically, failing to stop at red lights and stop signs at a high rate of speed. The truck was at the intersection of La Homa Road and 2 Mile Road when air support advised he had located the vehicle. The air support unit informed agents that pickup truck had several people laying in the bed of the pickup truck. The air support unit continued to provide mobile agents with the direction of travel until the pickup truck came to an abrupt stop. The air support unit observed the driver and passenger bail out along with all the subjects that were in the bed of the truck.

With the assistance of the air support unit, agents were able to locate the driver, later identified as Eduardo Alberto Jasso-Juares, and the passenger, later identified as Eduardo Martinez-Torres along with seven (7) additional subjects. An immigration inspection was conducted on all nine (9) subjects and they were all determined to be illegally present in the United States.

All subjects were transported to the McAllen Border Patrol Station to be processed accordingly.

PRINCIPAL STATEMENT:

Eduardo Alberto Jasso-Juares was read his Miranda rights. Jasso understood his rights and agreed to provide a sworn statement without the presence of an attorney.

Jasso stated that he was not sure how much he was going to be paid. Jasso stated that he works for a subject that provided the truck utilized for the smuggling attempt. Jasso stated that the truck was parked on Bentsen Palm Drive in Mission, Texas waiting for him. Once he entered the truck, Jasso claimed that his friend was sitting on the passenger seat. Jasso stated that his friend was receiving instructions over the phone of the location to pick up the illegal aliens. Jasso stated that he was driving erratically because he saw a Border Patrol Unit and he was afraid. Jasso stated that after he saw the helicopter following him, he decided to abandon the vehicle and tried to abscond. Jasso identified Martinez, through a photo lineup, as his friend that was talking on the phone.

CO-PRINCIPAL STATEMENT:

Eduardo Martinez-Torres was read his Miranda rights. Martinez understood his rights but declined to provide a sworn statement without the presence of an attorney.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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RE: Eduardo Alberto Jasso-Juares

CONTINUATION:

MATERIAL WITNESSES STATEMENTS:

Juan Ocampo-Rodriguez and Enrique Jesus Dominguez-Carrillo were read their Miranda Rights. Both understood and agreed to provide a sworn statement.

Ocampo, a citizen of Mexico, stated he made the smuggling arrangements and was going to pay \$6,700. After crossing the river along with eight other people, Ocampo claimed they spent the night in the brush and were told by the foot guide that a vehicle was going to pick them up in the morning. The next day, Ocampo stated the foot guide instructed them to board the vehicle as soon as it arrived. Ocampo stated they jumped into the bed of a red pickup truck. Ocampo claimed the pickup truck was going extremely fast and he feared for his life. Ocampo stated two male subjects exited the truck and ran away after making a hard stop.

Dominguez, a citizen of Mexico, stated he illegally crossed the river and boarded a red pickup truck. When the pickup truck arrived, Dominguez claimed the foot guide instructed him and the other aliens to board it. Dominguez stated they jumped into the bed of the truck and the pickup truck sped off. After the truck stopped, Dominguez claimed everyone ran off including the driver and the passenger.